

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF MISSOURI**

In re:)	In proceedings under Chapter 7
)	Honorable Dennis R. Dow
Charles Finch Ward,)	
)	Case No. 07-41777
Debtor,)	
)	
DaimlerChrysler Financial Services Americas,)	
)	
Movant.)	

MOTION TO LIFT STAY

COMES NOW DaimlerChrysler Financial Services Americas, L.L.C., the successor in interest to DaimlerChrysler Services North America, L.L.C., ("DaimlerChrysler"), by counsel, and respectfully moves to lift the automatic stay on the following grounds:

1. On the date of the filing of this bankruptcy proceeding, DaimlerChrysler was owed at least \$27,012.65, secured by a 2000 Freightliner FLD120, VIN: 1FUPCSZB0YPB96199.
2. At the time of filing, the retail value of the vehicle was \$37,025.00.
3. Copies of the documents which evidence the claim and perfected security interest of DaimlerChrysler are available upon request, as indicated in the Summary of Exhibits incorporated herewith.
4. The undersigned certifies that legible copies of all documents evidencing perfection of security interests have been served by mail on the Trustee and Debtor's counsel.
5. There is no substantial equity in the vehicle and it is not needed for an effective reorganization.

6. Debtor has not opted for reaffirmation under §524(c) or for redemption under §722.

7. Debtor is due and owing for all payments to DaimlerChrysler since January 15, 2007, payments totaling approximately \$2,737.30.

8. Debtor's vehicle was repossessed pre-petition, and Debtor intends to surrender the vehicle to DaimlerChrysler.

9. DaimlerChrysler requests that any order modifying the stay be effective immediately as allowed under Federal Bankruptcy Rule 4001(a)(3).

WHEREFORE, DaimlerChrysler Financial Services Americas, L.L.C., the successor in interest to DaimlerChrysler Services North America, L.L.C., respectfully requests that the Court lift the automatic stay of 11 U.S.C. §362 as to the vehicle described above, that the vehicle be abandoned by the Chapter 7 Trustee as an asset of the bankruptcy estate, effective upon the date of the order, that any order modifying the stay be effective immediately as allowed under Federal Bankruptcy Rule 4001(a)(3), and that the Court enter such further relief as is proper.

RIEZMAN BERGER, P.C.

/s/ Robert B. McMaster, #54116

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SUMMARY OF EXHIBITS

The following exhibits in reference to the Motion to Lift Stay are available upon request:

1. Retail installment sale contract.
2. Proof of perfection of security interest.

RIEZMAN BERGER, P.C.

/s/ Robert B. McMaster, #54116

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